

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

STEPHANIE P. JONES,)	
)	
PLAINTIFF,)	
)	
V.)	CASE NO: 2:07cv695-WKW
)	
AFNI, INC., ET AL.,)	
)	
DEFENDANTS.)	
)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Federal Rule of Civil Procedure 26(f), that meeting was held by a series of e-mail and telephone communications between October 3 and October 9, 2007, with Robert Kirby for the Plaintiff, Neal D. Moore, III for the Defendant, Afni, Inc., and Matt Parnell, for the Defendant, Palisades, for the purposes of setting forth and agreeing to a proposed discovery plan.

2. Pre-Discovery Disclosures: The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) by October 24, 2007.

3. Discovery Plan: The parties jointly propose to the Court the following discovery plan:

a. Discovery will be needed on the following issues: the history of the account or accounts in question, the validity of any dispute regarding the accounts, compliance with the FDCPA, and the alleged violations of the same, the damages alleged by the plaintiff, including economic loss and expense and mental anguish, and mitigation of the same, and all allegations and affirmative defenses pled.

b. All discovery commenced in time to be completed by July 31, 2008.

c. Maximum of 25 interrogatories by each party to the other party, responses due 30 days after service.

d. Maximum of 25 requests for admissions by each party to the other party, responses due 30 days after service.

e. Maximum of 6 depositions by the Plaintiff and 6 depositions by the Defendants.

f. Each deposition, other than of experts, limited to a maximum of seven hours unless extended by agreement of the parties or by order of this Court.

g. Reports from retained experts under Rule 26(a)(2) due from Plaintiffs by February 29, 2008, and to be deposed by March 31, 2008; and expert reports from Defendants by May 16, 2008, and to be deposed by June 13, 2008.

h. Supplementation under Rule 26 due May 1, 2008.

4. Other Items:

a. The parties do not request a conference with the Court before entry of this scheduling order.

b. The parties request a pre-trial conference in July of 2008.

c. Plaintiffs should be allowed until January 31, 2008, to join additional parties and until February 28, 2008, to amend the pleadings.

d. Defendants should be allowed until March 30, 2008, to join additional parties, and until April 15, 2008, to amend the pleadings.

e. All potentially dispositive motions should be filed by July 15, 2008.

f. Settlement cannot be evaluated prior to December 15, 2007.

g. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from the Plaintiff by August 22, 2008, and from the Defendant by August 22, 2008.

h. Parties should have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

i. The case should be ready for trial by September, 2008, and at this time is expected to take approximately two days.

/s/ Neal D. Moore, III
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